

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF WISCONSIN  
GREEN BAY DIVISION

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FRANCESCA WILDER,

Case No. 18CV363

Plaintiff,

v.

ALPHA SENIOR CONCEPTS,

Defendant.

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**JOINT RULE 26(f) REPORT**

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Plaintiff, Francesca Wilder, by and through her counsel, Ryan Kastelic, and Defendant, A'View Senior Living, Inc. d/b/a Alpha Senior Concepts (the "Company"), by and through its counsel, Godfrey & Kahn, S.C., submit the following report and proposed schedule in accordance with Fed. R. Civ. Proc. 26(f). Counsel for the parties conferred about the matter set forth below on August 1, 2018. The scheduling conference in this matter will be held by telephone on August 10, 2018 at 9:20 a.m. before the Honorable William C. Griesbach.

**I. NATURE OF THE CASE**

Ms. Wilder was employed by the Company as a caregiver. Ms. Wilder contends that the Company terminated her based on race in violation of Title VII of the Civil Rights Act of 1964. The Company denies the allegations and maintains that it terminated Ms. Wilder because it reasonably and in good faith believed that she was involved in the theft or diversion of medication and lied to the Company.

**II. POTENTIAL FOR SETTLEMENT OR RESOLUTION**

Both parties indicated that they were open to discussing settlement early in the litigation. Ms. Wilder will submit a demand to the Company by no later than August 13, 2018.

### **III. DISCOVERY PLAN**

A. The parties agree to exchange initial disclosures under Rule 26(a)(1) no later than August 17, 2018. The parties do not believe there is a need for any changes to the form or requirement for Rule 26(a)(1) disclosures.

B. Amendments to the pleadings will be filed by September 7, 2018.

C. The parties agree that the subjects of discovery will include Ms. Wilder's termination and damages. The parties do not believe there is a need to conduct discovery in phases or to limit the scope or timing of discovery to particular issues. The parties expect all discovery to be completed by June 12, 2019.

D. The parties do not currently foresee the need for any changes to the limitations on discovery. The parties anticipate conducting both written discovery and depositions. With regard to expert witness disclosures, Ms. Wilder will identify her expert witnesses and disclose their reports on or before December 1, 2018. Defendant shall have until March 15, 2019, to name its expert witnesses and disclose their reports.

E. The parties agree that electronically stored information may be requested in this case. The parties agree to discuss the format of the production of electronically stored information prior to the production of such information if such production is voluminous. The anticipated format for electronically stored information is .tiff format.

### **IV. MOTIONS**

The parties propose that motions for summary judgment be filed with the Court on or before July 15, 2019; responses filed within thirty (30) days thereafter; replies to be filed within fourteen (14) days thereafter.

**V. TRIAL DATE**

The parties request that a trial date be set following the resolution of dispositive motions.

The parties anticipate a trial length of up to two days.

Dated this 3rd day of August, 2018.

*s/Ryan Kastelic*  
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